

Exhibit 28

PLAINTIFF HARFORD COUNTY BOARD OF EDUCATION OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (HARFORD) (SD MSJ NO. 6)

Case No.: 4:22-md-03047-YGR

MDL No. 3047

Member Case No.: 4:23-cv-03065-YGR

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

:
IN RE: SOCIAL MEDIA : Case No.
ADOLESCENT ADDICTION/ : 4:22-MD-03047-YGR
PERSONAL INJURY PRODUCTS :
LIABILITY LITIGATION, : MDL No. 3047

:

:
This Document Relates to: :
Board of Education of :
Harford County v. Meta :
Platforms Inc., et al. :
:
Case No. 4:23-cv-03065 :

:

Friday, March 14, 2025

30(b)(6) video deposition of ANDREW
MOORE, taken at the Offices of the Harford County
Public Schools Central Administration Building,
located at 102 South Hickory Avenue, Bel Air,
Maryland, beginning at 9:00 a.m., EST, before
Ryan K. Black, Registered Professional Reporter,
Certified Livenote Reporter and Notary Public
in and for the State of Maryland.

1 A P P E A R A N C E S:

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Andrew Moore

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24 ALSO PRESENT:

25 Brad Loy - Legal Videographer

I N D E X

TESTIMONY OF: ANDREW MOORE	PAGE
By Mr. Keyes.....	5

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Moore 30(b)(6) 1	a document titled Defendant's Second Amended Notice of Oral and Videotaped Deposition of Drew Moore Request for Production of Documents.....	6
Moore 30(b)(6) 2	a Notice titled Defendant's Amended Supplemental Notice of Oral and Videotaped 30(b)(6) Deposition of Plaintiff Board of Education of Harford County.....	7

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1 THE VIDEOGRAPHER: We are now on the
2 record. My name is Bradley Loy. I'm the
3 videographer for Golkow Litigation Services.
4 Today's date is March 14th, 2025. The time is
5 9:00.

6 This video deposition is being held in
7 Bel Air, Maryland, in the matter of Social Media
8 Adolescent Addiction/Personal Injury Products
9 Liability Litigation for the United States
10 District Court Northern District of California.
11 The deponent is Drew Moore.

12 Will counsel please identify themselves?

13 MR. KEYES: Andrew Keyes and Armani
14 Madison, for Google and YouTube defendants.

15 MR. LEGG: Matt Legg and Wray Fitch on
16 behalf of the plaintiff.

17 MR. JAMES: Scott James, counsel for the
18 Meta defendants.

19 THE VIDEOGRAPHER: And those online?

20 (Whereupon, no appearances were heard by
21 participants in the deposition room from remote
22 attendees.)

23 THE VIDEOGRAPHER: All right.

24 And, sir, Court Reporter, can I get your
25 name again?

1 THE REPORTER: Ryan Black.

2 THE VIDEOGRAPHER: Ryan what?

3 THE REPORTER: Black.

4 THE VIDEOGRAPHER: The court reporter is
5 Ryan Black and will now swear in the witness.

6 * * *

7 Whereupon --

8 ANDREW MOORE,
9 called to testify, having been first duly sworn
10 affirmed, was examined and testified as follows:

11 * * *

12 30(b)(6) EXAMINATION

13 BY MR. KEYES:

14 Q. Good morning, Mr. Moore. My name is
15 Andrew Keyes. I'm from the law firm of Williams
16 & Connolly, and we represent the Google and
17 YouTube defendants.

18 A. Good morning.

19 Q. Would you please state your name and
20 introduce yourself to the jury.

21 A. Andrew Moore, Director of Technology,
22 Harford County Public Schools.

23 Q. Do you understand that you are under
24 oath today?

25 A. Yes, sir.

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1 Q. And do you understand that you are here
2 as a corporate representative of Harford County
3 Public Schools to address a particular topic?

4 A. I do.

5 Q. You are a current employee of Harford
6 County Public Schools?

7 A. I am.

8 Q. What is your current title?

9 A. Director of Technology.

10 Q. And how long have you been the Director
11 of Technology?

12 A. Since February of 2000 -- I'm sorry.
13 2000. February of 2000, so 25 years.

14 (Moore 30(B)(6) Exhibit No. 1, a
15 document titled Defendant's Second Amended Notice
16 of Oral and Videotaped Deposition of Drew Moore
17 Request for Production of Documents, was
18 introduced.)

19 BY MR. KEYES:

20 Q. Okay. I'm showing you what has been
21 marked as Moore Exhibit 1.

22 This is a document titled Defendant's
23 Second Amended Notice of Oral and Videotaped
24 Deposition of Drew Moore Request for Production
25 of Documents.

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1 And if you look at the first paragraph,
2 it says that you will appear as a corporate
3 representative on Topic 7.

4 Is that your understanding?

5 A. Would -- what is the clarification of
6 Topic 7?

7 Q. Sure. I'll hand you what has been
8 marked as Moore Exhibit 2.

9 (Moore 30(B)(6) Exhibit No. 2, a Notice
10 titled Defendant's Amended Supplemental Notice
11 of Oral and Videotaped 30(b)(6) Deposition of
12 Plaintiff Board of Education of Harford County,
13 was introduced.)

14 BY MR. KEYES:

15 Q. This document is titled Defendant's
16 Amended Supplemental Notice of Oral and
17 Videotaped 30(b)(6) Deposition of Plaintiff Board
18 of Education of Harford County. It's a notice.
19 And then you'll see there are a number of topics
20 attached. And if you turn to Page 8 of this
21 document, you'll see that Topic 7 starts at the
22 bottom of Page 8 and continues to the top of
23 Page 9.

24 Tell me when you've reviewed Exhibit 2.

25 A. (Reviews document.)

1 I've reviewed.

2 Q. Okay. Have you reviewed Topic 7 in
3 Exhibit 2?

4 A. Yes.

5 Q. Okay. And are you prepared to testify
6 as Harford County Public Schools' corporate
7 representative on Topic 7?

8 A. Yes, sir.

9 Q. Okay. Topic 7 says, "District-wide and
10 school-wide, to the extent they differ, policies,
11 procedures or practices regarding the use of
12 Google Chromebook, Google Workspace, Google
13 Workspace for Education, Google for Education,
14 Google Apps for Education and/or Google Suite
15 Enterprise for Education by you, your schools, or
16 your staff, one, in the classroom, as part of the
17 curriculum or other ways to educate students;
18 two, to advertise or promote you or your schools
19 policies or events; or, three, to communicate
20 with students or their parents or caretakers and
21 any training and education provided to student or
22 staff regarding such use."

23 Do you see that?

24 A. Yes, sir.

25 Q. Okay. Are -- did you do anything to

1 prepare to testify on that topic?

2 A. Other than my knowledge?

3 Q. Yes.

4 A. In my position?

5 Q. Well, I -- I assume you have knowledge
6 from your time as -- as Director of Information
7 Technology. Did you do anything to prepare for
8 today's deposition?

9 A. I have met with my legal counsel --

10 Q. Okay.

11 A. -- to -- to --

12 Q. Did you do anything else?

13 A. No, sir.

14 Q. When did you meet with your counsel?

15 A. I have met with them twice.

16 Q. When was the first time?

17 A. I don't recall the exact date.

18 Q. Can you give me a rough estimate?

19 A. Two weeks ago.

20 Q. Okay. When was the second time?

21 A. Yesterday, March 13th.

22 Q. And when you met with counsel the first
23 time, who were you referring to specifically?

24 A. Mr. Legg. Kelly. I do not know her
25 last name.

1 Q. Okay. Anyone else?

2 A. No, sir.

3 Q. Did any non-attorneys participate in
4 that meeting?

5 A. No.

6 Q. And how long was that meeting?

7 A. Roughly 60 minutes.

8 Q. And when you met with counsel yesterday,
9 with whom did you meet specifically?

10 A. Mr. Legg and Mr. Fitch.

11 Q. And you understand Mr. Legg, Mr. Fitch
12 and Kelly to be counsel for Harford County Public
13 Schools; is that correct?

14 A. I understand that they are representing
15 the plaintiff in this suit.

16 Q. And do you understand the plaintiff to
17 be Harford County?

18 A. Yes, sir.

19 Q. Okay. When you met with Mr. Legg and
20 Mr. Fitch yesterday, how long did you meet with
21 them?

22 A. Approximately 120 minutes.

23 Q. And in your two meetings roughly two
24 weeks ago and then yesterday, did you review any
25 documents?

1 A. Yes.

2 Q. What documents did you review to
3 prepare?

4 A. The first document that you provided
5 this morning.

6 Q. Exhibit 1?

7 A. It was Exhibit 1 or Exhibit 2. It might
8 have been --

9 Q. Is it the one that lists the topics?

10 A. It was this one here with the Exhibit
11 A --

12 Q. Okay.

13 A. -- so --

14 Q. Okay.

15 A. I don't have the --

16 Q. Oh, so you don't have the version with
17 the sticker number?

18 For the record, can you give us the
19 exhibit number of the document?

20 A. Yes, sir. Exhibit 1.

21 Q. Okay. Did you review any other
22 documents besides Exhibit 1?

23 A. No, sir.

24 Q. Okay. Have you ever given testimony
25 under oath before?

1 A. No, sir.

2 Q. Is there any reason you cannot give
3 accurate and complete testimony on questions
4 about Topic 7?

5 A. No, sir.

6 Q. Does Harford County Public Schools Use
7 any Google products?

8 A. Yes.

9 Q. What Google products does Harford County
10 Public Schools use?

11 A. YouTube. We use -- we do not use Google
12 Chromebooks, but we use Chromebooks that use the
13 Google environment -- operating system, I should
14 say.

15 Q. What kind of Chromebooks do you use?

16 A. Dell.

17 Q. Okay. So you use Dell Chromebooks with
18 the Google operating system?

19 A. Yes.

20 Q. Okay. Do you use any other
21 Google products besides YouTube and then Dell
22 Chromebooks with the Google operating system?

23 A. No, sir.

24 Q. Has Harford County Public Schools in
25 the past used any other Google products besides

1 YouTube or Dell Chrome -- Chromebooks with the
2 Google operating system?

3 A. No, sir.

4 Q. When did Harford County Public Schools
5 first start using YouTube?

6 A. Staff, approximately 2013. Students,
7 2020.

8 Q. Why did Harford County Public Schools'
9 staff start using YouTube in approximately 2013?

10 A. I have no knowledge of why.

11 Q. Who made the decision that staff would
12 have access to YouTube?

13 A. I have no knowledge of that.

14 Q. Who made the decision?

15 A. Who made --

16 Q. Who made the decision? Do you know who
17 made the decision?

18 A. I do -- I do not.

19 Q. Okay. And how -- how did staff use
20 YouTube starting in approximately 2013?

21 A. I have no insight as to how that is
22 used.

23 Q. Okay. You don't know particular
24 instances when a staff member may use it, but if
25 they wanted to use it, was this enabled somehow?

1 MR. LEGG: Objection to form.

2 You can answer.

3 THE WITNESS: It was available from 2013
4 forward.

5 BY MR. KEYES:

6 Q. And how did Harford County Public
7 Schools make it available to staff?

8 A. It is not blocked by our content filter.

9 Q. Anything else?

10 A. No, sir.

11 Q. Okay. Some school systems can access
12 YouTube by enabling that as a feature or a
13 service on Google Workspace for Education.
14 Has Harford County Public Schools used Google
15 Workspace for Education?

16 A. No, sir.

17 Q. Okay. And so when you say that staff
18 started using YouTube in approximately 2013, is
19 that when a decision was made to allow YouTube
20 to be accessed and not be blocked by the school
21 system's internet content filter?

22 A. Yes.

23 Q. Okay. What internet content filter does
24 Harford County Public Schools use now?

25 A. For staff, Palo Alto.

1 Q. Okay. And for students?

2 A. Cisco Securely.

3 Q. And how long has Harford County Public
4 Schools used Palo Alto as the internet content
5 filter for staff?

6 A. Less than 10 years.

7 Q. What did Harford County Public Schools
8 use as the internet content filter for staff
9 before using Palo Alto?

10 A. Check Point.

11 Q. And for how long did it use that service
12 or product as the internet content filter for
13 staff?

14 A. I don't recall.

15 Q. Okay. And for how long has Harford
16 County Public Schools been using Cisco Securely
17 as the internet content filter for students?

18 A. Since 2023.

19 Q. And what internet content filter did
20 Harford County Public Schools use before Cisco
21 Securely?

22 A. For students?

23 Q. For students.

24 A. A product called Umbrella.

25 Q. And for what period of time did

1 Harford County Public Schools use Umbrella
2 as the internet content filter for students?

3 A. From 2020 to 2023.

4 Q. And what internet content filter did
5 Harford County Public Schools use for students
6 prior to Umbrella?

7 A. It was -- it was collapsed to use the
8 same Palo Alto.

9 Q. Okay. So prior to 2020, Palo Alto was
10 the internet content filter for both staff and
11 students?

12 A. Correct.

13 Q. Okay. So when staff were first allowed
14 access to YouTube, were there any restrictions
15 set on that access?

16 A. I do not recall.

17 Q. Okay. Since approximately 2013 when
18 staff have been permitted access to YouTube, have
19 any restrictions been imposed?

20 A. I don't recall the current settings.

21 Q. Okay. If you wanted to determine what
22 settings were in place regarding staff access to
23 YouTube, where would you go?

24 A. I'd have to refer back to my
25 environment.

1 Q. Okay. And where in the environment
2 would you look?

3 A. Well, it would be my YouTube setting,
4 because that -- we would force it across to
5 everyone.

6 Q. Okay. So if you looked at your own
7 access, you could tell what access staff have to
8 YouTube?

9 A. Yes. Correct.

10 Q. Okay. Do you believe there's any
11 restriction at all on YouTube --

12 A. Yes.

13 Q. -- when it comes to staff?

14 A. Yes.

15 Q. Okay. So there's some kind of restrict
16 -- restricted setting? You just don't know what
17 it is sitting here today?

18 A. I -- I believe it's SafeSearch --

19 Q. Okay.

20 A. -- that's been activated.

21 Q. And is it your belief that SafeSearch
22 has been activated since 2013?

23 A. I do not recall that.

24 Q. Okay. Do you recall, at any point since
25 2013 through the present, adjusting what the

1 setting was for staff access to YouTube?

2 A. I do not recall that.

3 Q. Okay. We've talked about an internet
4 content filter for staff and for students. Am
5 I correct in understanding that the internet
6 content filter that you used, whether it be Palo
7 Alto, Check Point, Cisco Securely, Umbrella or
8 Palo Alto, applied to staff or students accessing
9 the internet on any Harford County Public
10 Schools' issued devices?

11 MR. LEGG: Objection to form.

12 You can answer.

13 THE WITNESS: Yes.

14 BY MR. KEYES:

15 Q. Okay. And am I also correct in
16 understanding that those internet content filters
17 would also apply to staff or students or other
18 guests who accessed the internet through Harford
19 County Public Schools' network?

20 A. Yes.

21 Q. Okay. So whether we're talking about
22 staff or students, and whether we're talking
23 about one product or another, throughout this
24 time period the internet content filter applies
25 to people's access to the internet whether

1 they're using a Harford County Public
2 Schools-issued device or they're otherwise
3 accessing the internet through the Harford
4 County Public Schools network.

5 MR. LEGG: Objection to form.

6 BY MR. KEYES:

7 Q. Is that correct?

8 A. Yes.

9 Q. Okay. Why were students first given
10 access to YouTube in 2020?

11 A. Did you say why?

12 Q. I did. Yeah.

13 A. I believe the curriculum area asked us.

14 Q. And when you refer to the curriculum
15 area, what are you referring to?

16 A. The Office of Curriculum Instruction.

17 Q. And is there someone who leads that
18 Office of Curriculum Instruction?

19 A. Yes.

20 Q. What position within Harford County
21 Public Schools leads the Office of Curriculum
22 Instruction?

23 A. Executive Director.

24 Q. And who held that position in 2020 when
25 a decision was made to give students access to

1 YouTube?

2 A. Dr. Susan Brown.

3 Q. Is it your belief that Dr. Susan Brown
4 made the decision to give students access to
5 YouTube?

6 A. It is my belief, --

7 Q. Okay. And then --

8 A. -- acting in her capacity.

9 Q. Okay. Once the decision was made,
10 was it your or your staff's responsibility to
11 implement it then?

12 A. Yes, sir.

13 Q. And did you implement it then by
14 adjusting the settings on the internet content
15 filter then being used for students?

16 A. Yes, sir.

17 Q. Okay. What -- what settings were used
18 to restrict or not restrict students' access to
19 YouTube either on the Harford County Public
20 Schools' devices or the Harford County Public
21 Schools' network?

22 MR. LEGG: Objection to form.

23 You can answer.

24 THE WITNESS: It's not really a setting.
25 It's a matter of identifying an -- to unblock the

1 URL.

2 BY MR. KEYES:

3 Q. Okay. And so whereas prior to this
4 decision in 2020 students could not access any
5 YouTube content on either Harford County Public
6 Schools' devices or its network.

7 MR. LEGG: Objection to form.

8 BY MR. KEYES:

9 Q. Is that correct?

10 A. Correct.

11 Q. And after the decision was made, YouTube
12 would then unblock; it was a permitted website.
13 Is that correct?

14 A. Correct.

15 Q. In making YouTube available as
16 an unblocked website, were there any other
17 restrictions that were imposed by Harford County
18 Public Schools?

19 A. Yes.

20 Q. What were those restrictions?

21 A. Grades 3 to 5 have Strict Restriction
22 Mode applied. Grades 6 through 12 have I believe
23 it's called Strict Restriction -- Modified
24 Restriction. Sorry.

25 Q. I want to make sure I understand you

1 correctly. You believe it was Strict Restriction
2 Mode for grades 3 through 5?

3 A. Strict Restriction, 3 to 5 grades.

4 Q. Okay. And --

5 A. And Modified Restriction, grades 6 to
6 12.

7 Q. And were those restrictions imposed in
8 2020 when students were first given access to
9 YouTube?

10 A. To my knowledge.

11 Q. Have those restrictions been modified at
12 any point in time since 2020?

13 A. No, sir.

14 Q. So for the last five years, students can
15 access YouTube through the Harford County Public
16 Schools' internet content filter, correct?

17 A. Yes.

18 Q. But if you're in grades 3 through 5, you
19 can only access YouTube in the Strict Restriction
20 mode; is that correct?

21 A. I believe that's the -- the Google
22 setting.

23 Q. Okay. And since 2020, Harford County
24 Public Schools students can access YouTube
25 through its internet content filter at the

1 Modified Restriction; --

2 MR. LEGG: Objection to form.

3 BY MR. KEYES:

4 Q. -- is that correct?

5 A. Please restate.

6 Q. Sure.

7 Since 2020, students in grades 6 through
8 12 have been permitted to access YouTube through
9 the Harford County Public Schools' internet
10 content filter using the Modified Restriction
11 mode?

12 A. Correct.

13 Q. Are you able to tell me the differences
14 between the Strict Restriction mode and the
15 Modified Restriction mode?

16 A. I cannot.

17 Q. Is it your understanding that the Strict
18 Restriction mode is more restrictive of content
19 that can be accessed on YouTube --

20 MR. LEGG: Object to form.

21 BY MR. KEYES:

22 Q. -- than the modified restriction mode;
23 that is, grades 3 through 5 can see less than
24 grades 6 through 12?

25 A. It is my understanding that the Strict

1 Restriction does provide a higher level -- I
2 don't know if it's actual content or if it's what
3 has been posted, but I do believe that there is a
4 difference between Strict and Modified.

5 Modified is less. I'm not YouTube --

6 Q. Modified is less restrictive than
7 strict?

8 A. Correct.

9 Q. Okay. Have students in grades K through
10 second grade been given access to YouTube on
11 Harford County Public Schools' internet content
12 filter?

13 A. No, sir.

14 Q. Okay. At any point in time?

15 A. No, sir.

16 Q. Okay. And is there any decision, to
17 your knowledge, to change students' access to
18 YouTube on the Harford County Public Schools'
19 internet content filter going forward?

20 A. Not to my knowledge.

21 Q. Okay. Have -- have you received any
22 requests from principals or teachers to make
23 YouTube more available to students than it has
24 been?

25 A. No.

1 MR. LEGG: Objection to form.

2 BY MR. KEYES:

3 Q. Excuse me?

4 A. No.

5 Q. No? Okay.

6 Okay. You also testified that Harford
7 County Public Schools uses Dell Chromebooks using
8 the Google operating system.

9 When you say, "uses those Chromebooks,"
10 are those Chromebooks that are distributed to
11 students for their use for an entire academic
12 year?

13 A. Yes, sir.

14 Q. And is Harford County Public Schools
15 currently a one-to-one school system?

16 A. Yes, sir.

17 Q. Which means one device is assigned to
18 each student, such that every student has a
19 device?

20 A. Yes, sir.

21 Q. For how long has Harford County Public
22 Schools been a one-to-one system?

23 A. October of 2020.

24 Q. And was the decision to become a
25 one-to-one system made in conjunction with the

1 pandemic?

2 A. Yes, sir.

3 Q. And in conjunction with the shutdown of
4 in-person learning?

5 A. Yes, sir.

6 Q. And so did Harford County Public Schools
7 reach the point in October of 2020 where it was a
8 one-to-one system and every student had their own
9 assigned device?

10 MR. LEGG: Objection to form.

11 THE WITNESS: Yes.

12 BY MR. KEYES:

13 Q. And were all -- and was that K through
14 12?

15 A. K through 12, one to one, correct.

16 Q. Okay. And -- and did staff also get
17 their own assigned device?

18 A. Yes.

19 Q. Also at least as of October of 2020?

20 A. I don't recall the exact date that staff
21 went one to one.

22 Q. Okay. Was it before or after students?

23 A. Relative the same time -- relatively the
24 same time.

25 Q. And the Chromebooks, do they have

1 software that prohibits students from installing
2 their own software on the Chromebooks?

3 A. I'm -- I'm pausing to -- to answer this
4 in a non-technical way.

5 Q. Thank you.

6 A. There are preventive measures from
7 loading products onto Chromebooks.

8 Q. Okay. And we've talked about an
9 internet content filter. Am I correct in
10 understanding that the internet content filter
11 applies to anyone who accesses the Harford County
12 Public Schools network?

13 A. Yes.

14 Q. And am I also correct in understanding
15 that the internet content filter operates on all
16 Harford County Public Schools-issued Chromebooks
17 regardless of where the Chromebook is being used?

18 A. Yes.

19 Q. So if a student is using their
20 Chromebook at school, the internet content filter
21 applies. But it also applies if they're using
22 the Chromebook at home or if they're using the
23 Chromebook somewhere else.

24 A. Yes.

25 Q. And are there any differences at all

1 between how the internet -- what content is
2 blocked by the internet content filter depending
3 on location?

4 A. No.

5 Q. Any differences between how content is
6 blocked between using a Harford County Public
7 Schools-issued Chromebook versus accessing the
8 Harford County Public Schools network?

9 A. No different.

10 MR. KEYES: Can we take a five-minute
11 break?

12 THE VIDEOGRAPHER: Stand by.

13 We are off the record at 9:28.

14 (Recess taken.)

15 THE VIDEOGRAPHER: We are on the record
16 at 9:35.

17 BY MR. KEYES:

18 Q. Mr. Moore, to your knowledge, have any
19 students or parents requested that students be
20 given more access to YouTube?

21 A. Not to my knowledge.

22 Q. So you identified earlier two Google
23 products that Harford County Public Schools
24 system has used. The first one was YouTube.
25 Has -- to your knowledge, has Harford County

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1 Public Schools entered any contractual
2 arrangement with Google or YouTube?

3 A. No, sir.

4 Q. You also mentioned that Harford County
5 Public Schools uses Dell Chromebooks that use
6 the Google operating system. Are -- to your
7 knowledge, has Harford County Public Schools
8 entered any contractual arrangement with Google
9 or YouTube regarding those Chromebooks?

10 A. Please state again.

11 Q. Sure. To your knowledge, has Harford
12 County Public Schools entered any contractual
13 arrangement with either Google or YouTube
14 regarding those Dell Chromebooks that use
15 the Google operating system?

16 A. We have not.

17 Q. Okay. Are you aware of any other
18 contractual arrangement between Harford County
19 Public Schools and either Google or YouTube?

20 A. I am not.

21 MR. KEYES: Okay. Thank you for your
22 testimony as Harford County Public Schools'
23 corporate representative.

24 THE VIDEOGRAPHER: Stand by.

25 We are off the record at 9:36.

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(Deposition concluded -- 9:36 a.m.)

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C E R T I F I C A T E

I do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this _____ day of _____, 2025



Notary Public

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

3 _____

5 | _____

7 | Change: _____

9

11 Change: _____

13 | _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _

15 Change : _____

17 | _ _ _ _ _

19 Change: _____

21

23 | Change : _____

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1	PAGE	LINE	CHANGE
2	— — —	— — —	— — — — — — — — — — — — — — — —
3	Reason for		
4	Change:	_____	
5	PAGE	LINE	CHANGE
6	— — —	— — —	— — — — — — — — — — — — — — — —
7	Reason for		
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10	— — —	— — —	— — — — — — — — — — — — — — — —
11	Reason for		
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14	— — —	— — —	— — — — — — — — — — — — — — — —
15	Reason for		
16	Change:	_____	
17	PAGE	LINE	CHANGE
18	— — —	— — —	— — — — — — — — — — — — — — — —
19	Reason for		
20	Change:	_____	
21	PAGE	LINE	CHANGE
22	— — —	— — —	— — — — — — — — — — — — — — — —
23	Reason for		
24	Change:	_____	
25			

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ACKNOWLEDGMENT OF DEPONENT

I, _____, do
hereby certify that I have read the foregoing
pages __ to ____ and that the same is a
correct transcription of the answers given by
me to the questions therein propounded,
except for the corrections or changes in form
or substance, if any, noted in the attached
Errata Sheet.

DATE

SIGNATURE

Subscribed and sworn to before
me this _____ day of _____, 2025.

My commission expires:

Notary Public

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.